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Attorneys for Defendants

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
JORDAN HERZBERG,

Plaintiff,

- against -

MEGASPIREA PRODUCTIONS SAS,
MEGASPIREA INTERNATIONAL INC.,
MEGASPIREA HOLDINGS LTD.,
MEGASPIREA HOLDING A.G., MEGASPIREA
NV, and HERSCH REICH,

Defendants.
-----X

ECF Case

07 Civ. 10503 (RJS)(RLE)


NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Declaration of Mendel Klein dated January 29, 2008, the exhibits annexed thereto, the accompanying Memorandum of Law, and all proceedings had herein, defendants MegaSpirea Productions SAS, MegaSpirea International Inc., MegaSpirea Holdings Ltd., MegaSpirea Holdings A.G., MegaSpirea NV, and Hersch Reich will move this Court at the United States District Courthouse, 500 Pearl Street, Room 21C, New York, New York, at a date and time designated by the Court, for an Order, pursuant to Fed. R. Civ. P. 12(b)(1), (b)(2), and (b)(6), dismissing the complaint in its entirety with prejudice and awarding such further relief as the Court deems just, proper, and equitable.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's Order dated January 10, 2008, opposition papers, if any, are to be served upon the undersigned on or before February 14, 2008 and reply papers, if any, are to be served upon plaintiff's counsel on or before February 21, 2008.

Dated: New York, NY
January 31, 2008

REED SMITH LLP

By: 

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